

UNITED STATES DISTRICT COURT
For The DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:25-CV-10468-IT

TOMMY GIGUERE,
Petitioner

v.

STACY TARDIF,
Respondent

**PETITIONER'S SUPPLEMENTAL AFFIDAVIT OF FEES AND COSTS IN
CONNECTION WITH RETENTION OF CHILDREN IN MASSACHUSETTS
PURSUANT TO HAGUE CONVENTION ON CIVIL ASPECTS OF INTERNATIONAL
CHILD ABDUCTION ARTICLE 26 AND ICARA 42 USC 11607(b)(3)**

I, the undersigned, Tommy Giguere, of my own personal knowledge, and upon my oath
depose and state as follows:

1. I am the Petitioner in the above matter. In connection with my Hague Petition, I requested fees and costs be ordered along with the return of our children to Quebec, Canada. On July 23, 2025 I submitted my first Affidavit of Fees and Costs for \$134,530.27 USD and \$28,230.89 CAD, which I incorporate by reference. I hereby respectfully submit a supplemental Affidavit because after I submitted my first affidavit, there was additional work done including but not limited to a fourth day of hearings for closing arguments and then the evidence was reopened to allow for affidavits regarding Husband and Wife conversations previously excluded and motions to strike were made and defended thus causing me to incur additional legal fees. Further, I have now paid fees in connection with Respondent, Stacy Tardif's Motion to Strike Judge Talwani's August 26, 2025 Judgment ordering the return of our children to Quebec, Canada.
2. I have incurred legal fees and costs in connection with my Hague Case with the law firm of Brick, Jones, McBrien & Hickey LLP in Massachusetts for this Hague Petition. I kept track

of the fees and costs directly linked to my Hague Case and previously submitted a chart (Exhibit 3 to my July 23, 2025 Affidavit) that I created listing out all the costs to date updated through the end of trial using the invoices I received. I have updated that chart and it is attached as Exhibit A.

3. More recently, given the reopening of the evidence for the following listed Affidavits, the Judgment that entered on August 26, 2025, and the need to respond to the emergency motion to stay, I have incurred legal fees and costs for the following: (i) Review Affidavit of Petitioner Pursuant to Memorandum and order Regarding Marital Disqualification filed on August 14, 2025, (ii) Preparation of Motion to Strike Portions of Respondent's Affidavit filed on August 14, 2025, (iii) Review Amended Affidavit of Respondent Pursuant to Memorandum and Order Regarding Marital Disqualification filed on August 15, 2025, (iv) Preparation of Petitioner's Affidavit Pursuant to Memorandum and Order Regarding Marital Disqualification, (v) Review of Respondent's Motion to Strike Petitioner's Affidavit filed on August 15, 2025, (vi) Preparation of Petitioner's Opposition to Respondent's Motion to Strike Petitioner's Affidavit filed on August 18, 2025, (vii) Review of Judgment and Findings of Fact and Conclusions of Law; (viii) Review The Respondent, Stacy Tardi's, Motion to Stay the Judgment Dated August 26, 2025 (Talwani, J) Requiring the Return of the Minor Children to Canada and Supporting Memorandum of Law filed on August 29, 2025, and (vii) Preparation of Petitioner's Opposition to Respondent's "Motion to Stay the Judgment Dated August 26, 2025 (Talwani, J) Requiring the Return of the Minor Children to Canada and Supporting Memorandum of Law" filed on August 31, 2025. The legal fees incurred since the conclusion of the trial total \$15,451.50 USD.
4. I am seeking an order of reimbursement in the sum of the \$37,810.67 USD I was billed on August 1, 2025 and the \$15,451.50. USD I was billed on September 1, 2025 in addition to

the previously submitted affidavit asking for \$134,530.27 USD for a total of \$174,853.05 USD and \$28,230.89 CAD. While I understand Stacy does not have this kind of money on hand, she does own half of the equity in our Townhouse in Salisbury, so I am asking that her equity be assigned to me up to the totals stated above.

Signed under the pains and penalties of perjury this 3rd day of September, 2025.

Tommy Giguere

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Tommy Giguere

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petitioner's Affidavit regarding legal fees and costs was electronically served on counsel for the respondent, Stacy Tardiff, at his email of record being mbarach@barachfamilylaw.com on this 3rd day of September, 2025.

Wendy O. Hickey

eSignature Details

Signer ID:	arNrvEX6zbeSBemsVdGhLy1U
Signed by:	Tommy Giguere
Sent to email:	tommgiguere1991@gmail.com
IP Address:	142.169.18.129
Signed at:	Sep 3 2025, 9:55 am EDT